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1 **LEWIS**
2 **AND**
3 **ROCA**
4 **LLP**
5 **LAWYERS**

6
7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

8 **WILLIAM A. MUNDELL**
9 **Chairman**

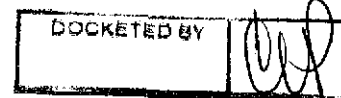
10 **JAMES M. IRVIN**
11 **Commissioner**

12 **MARC SPITZER**
13 **Commissioner**

Arizona Corporation Commission

DOCKETED

DEC 11 2001



14 **IN THE MATTER OF U S WEST**
15 **COMMUNICATIONS, INC.'S**
16 **COMPLIANCE WITH § 271 OF THE**
17 **TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

18
19 **WORLDCOM, INC.'S COMMENTS ON**
20 **FINAL REPORT FUNCTIONALITY TEST**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") files its
22 comments on Cap Gemini Ernst & Young's ("CGE&Y") Final Report Functionality Test
23 ("Functionality Report"), Version 1.0, dated October 11, 2001. WorldCom has also
24 reviewed the comments filed by AT&T Communications of the Mountain States, Inc. and
25 TCG Phoenix, (collectively, "AT&T") regarding the Functionality Test Summary Report
26

1 and concurs in those comments as well as AT&T's previously filed Comments on the
2 Functionality Test Report. Although Performance Measure Data Reconciliation is a
3 section of this report, since there is a separate workshop scheduled to address this section,
4 it is not addressed here.¹

6 **A. INTRODUCTION**

7 The Master Test Plan ("MTP") states that the functionality test is designed to
8 provide information to address the ability of Qwest's operation support systems ("OSS")
9 to provide operational functionality to CLECs. The test includes a test of Qwest's
10 processes including pre-ordering, ordering, provisioning, maintenance and repair, and
11 billing. The test focused on resale, UNE-P, UNE-Loop, UNE Loop with LNP, and
12 number portability. The purpose of functionality testing is to determine whether the ILEC
13 has developed sufficient electronic functions and manual interfaces to allow competing
14 carriers equivalent access to all of the necessary OSS functions.

17 As acknowledged by CGE&Y, a significant number of incident work orders that
18 are relevant to this test remain open and unresolved. In addition, significant retesting
19 remains to address deficiencies identified by CGE&Y. It is therefore premature to reach
20 any conclusions regarding the ability of Qwest's OSS to provide operational functionality
21 to CLECs.

25 ¹ See, WorldCom's Comments on CGE&Y's Data Reconciliation Report for Functionality Test file in this
26 docket on December 10, 2001.

B. SPECIFIC COMMENTS

1. Lack of Audit Controls and Validation

The tracking of functionality transaction history lacked appropriate audit controls by the Test Administrator. Valid mechanisms are necessary:

- a. To understand the life cycle of orders (pre-order through billing),
- b. To validate Qwest's actions taken per order are appropriate and timely,
- c. To track troubles and validates resolutions,
- d. To validate ordered services are properly billed in a timely manner, and
- e. To ensure data reconciliation is based on concrete evidence obtained during testing.

As Test Administrator, CGE&Y was tasked with not only executing the required order number and types but also required to have the ability to track the history of each order so that life cycles would be understood from pre-order through billing. There is no evidence in the Functionality Report or the supporting documentation that validates such audit control procedures were employed by CGE&Y. Much evidence is provided that suggests valid audit control mechanisms were not employed by CGE&Y, which results in discrepancies that must be explained and documented.

For instance, as Section 7.3.1 of the Test Standards Document ("TSD"), Version 2.9, states "As a result of these Statistical Sub-committee meetings, the overall test sample

1 quantity for the Arizona 271 Tests were established at approximately 1620-1890
2 Functionality test orders (for 12-14) flagged products/disaggregations,” yet according to
3 the Functionality Report, there were only 1567 order transactions issued. This discrepancy
4 must be explained and documented by CEG&Y.
5

6 Further, it is not possible to reconcile conclusions reached based on CGE&Y’s
7 supporting documentation. The supporting documentation included:

8 **FT1 (Friendly Database)**: Database including the specific information for each
9 Friendly (e.g., name, address).
10

11 **FT2 (Test Accounts)**: Functionality Test Accounts spreadsheet containing list of
12 transactions per customer. Including Directory Listing, Features from the friendly
13 database and the Pseudo-CLEC accounts built by Qwest and type of order to be executed.
14

15 **FT3 (Test Cases Matrix)**: Functionality Test Cases Matrix spreadsheet containing
16 the description of scenario requirements from Appendix A of the MTP.

17 **FT4 (Collocation)**: Collocation spreadsheet including the participant collocation
18 and the available Connecting Facility Assignments (“CFAs”).
19

20 **FT5 (Tracking Number List in Progress)**: Functionality Tracking number List in
21 Progress spreadsheet containing the iterations per scenario.

22 **FT6 (Return Order Log)**: Functionality Return Order Log spreadsheet containing
23 the daily tracking of order sent to the Pseudo-CLEC.
24

25 **FT7 (M&R Statistics)**: Maintenance & Repair Statistics spreadsheet containing the
26 results captured during testing.

1 **FT8 (Field Description per Table of Data.mdb):** Description of each Field per
2 Table used in the Access Database.

3 **#9 (Friendlies Test Installation Tracking.xls):** Spreadsheet including the tracking
4 for install on Friendly customers.
5

6 There is no supporting documentation supplied for billing -- a critical validation
7 step that requires an understanding of the order life cycle in order to ensure proper billing
8 took place. In addition, there is no one report or any combination of the above reports that
9 allows one to trace the history of orders from pre-order through billing. The evidence of
10 access to Qwest OSS can only be demonstrated if there is concrete evidence tracing
11 functional testing from pre-order through billing. This includes the ability to trace and
12 understand what was required to submit an order (including pre-order steps) along with
13 any and all responses provided, and what action was taken based by Qwest to validate the
14 issuance of an LSR. Subsequent actions taken by Qwest would then include how well the
15 requested services are provisioned based on each LSR, whether the ability to report and
16 resolve troubles is available, and how well Qwest bills for each order.
17
18

19
20 **2. Issues identified by CGE&Y and any proposed resolutions implemented**
21 **by Qwest must be validated.**

22 CGE&Y provided in the Final Report Functionality Test document version 1.0 the
23 following table that highlighted issues uncovered during testing and the associated
24 resolutions purported to be implemented by Qwest. (This table is not complete as testing
25 continued after issuance of this report):
26

	OSS Change	System Tables	Training	Procedure	Metrics	Documentation	TOTAL
Pre-Order	15	3	3	2	0	4	27
Order/ Provision	18	3	13	5	0	4	43
M&R	3	0	0	0	0	0	03
Billing	12	1	9	6	0	0	28
Performance Measures	0	1	0	0	15	0	16
TOTAL	48	8	25	13	15	8	117

What is lacking in this report are the validation steps CGE&Y employed upon implementation of a proposed fix, regardless of the type, to ensure the fixes address the original negative findings uncovered. If the military style (test until pass) philosophy is to be met in accordance with the MTP and TSD then any and all proposed fixes must be validated to ensure CLECs are not further negatively impacted.

CGE&Y states that the change management plan ("CMP") forum as a positive step in the ability for CLECs to provide input to system enhancements. Qwest's CMP is currently undergoing a redesign of the process to more adequately meet the needs of CLECs.² Until such a process has been fully established, implemented, proven to meet the needs of CLECs and found to be in compliance with the Federal Communications

² See, WorldCom's Response to Qwest Status Report filed in this docket on December 7, 2001, and Qwest's Status Report filed in this docket on or about November 30, 2001.

Commission's ("FCC") CMP requirements, it cannot be determined whether it resolves any of the issues.

3. MTP/TSD requirements not met

a. Quality of pre-order to order integration not fully evaluated via GUI and not tested at all for EDI

MTP Section 4.1 entitled "Functionality Test Purpose" states: "The integration quality of pre-order and order data will also be evaluated during the functionality tests." CGE&Y's Functionality Test lacks evidence that demonstrates the level of integration and the quality of integration provided to CLECs is sufficient. As well, TSD Section 3.1 entitled, "Scope," states "[t]he integration of pre-order data supplied by Qwest and the order data required by Qwest will be tested" making no distinction between GUI and EDI. Yet, CGE&Y failed to evaluate pre-order to order integration for EDI at all. CLECs' build of their side of an EDI interface must adhere to Qwest documented business rules, which may prohibit desired integration. Therefore, a full evaluation must be performed to determine if pre-order to order integration is sufficient to allow competing carriers a meaningful opportunity to compete through EDI and GUI as required by both the MTP and TSD.

b. Number of orders required per order type

In the Functionality Report, Section 2.2.4, entitled, "Results," CGE&Y "displays the products tested and the number of orders issued for each product cell to meet the sample size requirements specified in Section 9.2 of the TSD." While WorldCom

1 understand the need would arise whereby more than the planned number of orders would
2 be required to assure necessary exit criterion are met, WorldCom does not understand why
3 less than the planned number would be acceptable. CGE&Y explains that:

4
5 1. *Business POTS Conversion (Resale)*³ *Planned 140 vs. Issued 125:*

6 “Deficiency in the number of business qualified addresses prevented the execution
7 of sufficient tests to meet the number planned.”

8
9 2. *UNE-P Rural*⁴ *Planned 140 vs. Issued 119:* “Deficiency in rural

10 friendly addresses prevented the execution of sufficient tests to meet the number
11 planned”

12
13 3. *Residential POTS Conversion*⁵ *(Resale) Planned 140 vs. Issued 136:*

14 “Friendly participation declined at the end of the test”

15 The statistically valid sample sizes were established because it was determined to
16 be the minimum number of orders required to validate the expected results. As required
17 by TSD Section 9.2, entitled, “Design of Statistical Test,” the “parties have agreed to use a
18 sample size of 140 for each product/disaggregation level defined in Section 9.1.2 above.
19 One exception to this sample size is the product group of 4W (DS1, NL-Loop-4W), which
20 will have a sample size of 50.” By reducing the number of required samples, the test
21 integrity has been jeopardized.
22

23
24 ³ Deficiency in the number of business-qualified addresses prevented the execution of sufficient tests to
25 meet the number planned.

26 ⁴ Deficiency in rural friendly addresses prevented the execution of sufficient tests to meet the number
planned.

⁵ Friendly participation declined at the end of the test.

1 In addition, there is a discrepancy with the execution of orders related to DSL.
2 CGE&Y issued 22 orders to convert single line retail to DSL. In response to WorldCom's
3 question 32 , CGE&Y stated, "[w]ith TAG concurrence, CGE&Y attempted to execute 50
4 test cases. Of these 21 were disqualified for loop length," which left a difference of 29.
5 Upon further questioning at the Functionality Workshop, of the 29 attempted, only 11
6 generated LSRs for evaluation purposes. Thus it is questionable why in the Final Report
7 Functionality Test CGE&Y reflects 22 orders were issued.
8

9
10 c. Billing

11 Section 3.3 of the TSD entitled, "Billing Interfaces," states: "The billing process is
12 the means by which Qwest provides CLECs with wholesale bills, usage data and records
13 for the services, features, network elements (e.g., loop) and features that were ordered and
14 provisioned. The primary focus for testing the billing interfaces is to validate the
15 timeliness, accuracy and completeness of the Qwest billing processes." In order to perform
16 a valid audit of timeliness, accuracy and completeness of the Qwest billing processes, the
17 ability to track orders end to end is critical. Not only is the absence of supporting
18 documentation for billing a problem, but also evidence that indicates tracking of orders
19 from end to end is lacking which also taints the test results.
20
21

22 d. Emerging services
23

24 Emerging Services are considered products unavailable at the time the MTP or TSD
25 were written but became available to CLECs during the course of this test. WorldCom
26

1 jointly filed with AT&T and COX a formal request to have emerged services added to the
2 test.⁶ Inclusion of Sub-Loop, Dark Fiber, EELs, Shared Loop (Line Sharing), and Packet
3 Switching was discussed by the TAG at the August 21, 2001 meeting. It was determined
4 at that time that every effort would be made to solicit CLEC support as a means to test
5 these services but at a minimum CGE&Y would evaluate Qwest's methods and procedures
6 for emerging services to ensure proper deployment of such services could be performed by
7 CLECs. The Functionality Report lacks such evaluations for emerged services. It is
8 critical that these emerged services be evaluated.
9

11 e. Re-testing process and evaluation continues

12 The Functionality Report was solely based on the issuance of transactions required
13 by the MTP and TSD documents. There are no results reflected for any retesting that has
14 been required as a result of negative findings. There are a number of outstanding issues, as
15 highlighted above, that must be resolved prior to completion of the functionality test. In
16 addition, WorldCom's concerns regarding the appropriate audit control procedures
17 necessary during initial testing remain valid and relevant for retest transactions.
18

19
20 C. CONCLUSION

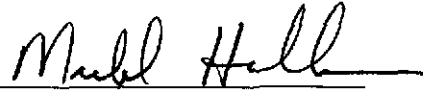
21 The Functionality Test Report prematurely makes conclusions before all the
22 required analyses and testing were conducted or performed and retesting was complete. It
23 also makes these conclusions before the relevant incident work orders were resolved and
24

25
26 ⁶ See, email to CGE&Y dated August 10, 2001.

1 closed. Accordingly, it does not demonstrate that Qwest has fulfilled the requirements
2 found in the MTP and TSD.

3 RESPECTFULLY submitted this 11th day of December, 2001.

4 LEWIS AND ROCA LLP

5
6 

7 Thomas H. Campbell
8 40 N. Central Avenue
9 Phoenix, Arizona 85007
Telephone (602) 262-5723

10 - AND -

11 Thomas F. Dixon
12 WorldCom, Inc.
13 707 - 17th Street, #3900
14 Denver, Colorado 80202
15 Telephone: (303) 390-6206

Attorneys for WorldCom, Inc.

16 ORIGINAL and ten (10)
17 copies of the foregoing filed
18 this 11th day of December, 2001,
with:

19 Arizona Corporation Commission
20 Docket Control - Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

21 COPY of the foregoing hand-
22 delivered this 11th day of December, 2001,
to:

23 Maureen Scott
24 Legal Division
25 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

LEWIS
AND
ROCA
LLP
LAWYERS

1 Jane Rodda, Administrative Law Judge
2 Arizona Corporation Commission
3 1200 W. Washington Street
4 Phoenix, Arizona 85007

5 Ernest Johnson, Director
6 Utilities Division
7 Arizona Corporation Commission
8 1200 W. Washington Street
9 Phoenix, Arizona 85007

10 COPY of the foregoing mailed
11 this 11th day of December, 2001, to:

12 Lyndon J. Godfrey
13 Vice President – Government Affairs
14 AT&T Communications of the
15 Mountain States
16 111 West Monroe, Suite 1201
17 Phoenix, Arizona 85003

18 Scott Wakefield
19 Residential Utility Consumer Office
20 2828 N. Central Avenue
21 Phoenix, Arizona 85004

22 Mark Dioguardi
23 Tiffany and Bosco PA
24 500 Dial Tower
25 1850 N. Central Avenue
26 Phoenix, Arizona 85004

Richard M. Rindler
Swidler & Berlin
3000 K. Street, N.W.
Suite 300
Washington, DC 20007

Maureen Arnold
US West Communications, Inc.
3033 N. Third Street
Room 1010
Phoenix, Arizona 85012

Jeffrey W. Crockett
Snell & Wilmer
One Arizona Center
Phoenix, Arizona 85004-0001

LEWIS
AND
ROCA
LLP
LAWYERS

1 Richard P. Kolb
Vice President – Regulatory Affairs
2 OnePoint Communications
Two Conway Park
3 150 Field Drive, Suite 300
Lake Forest, Illinois 60045

4 Andrew O. Isar
5 TRI
4312 92nd Avenue N.W.
6 Gig Harbor, Washington 98335

7 Darren S. Weingard
Stephen H. Kukta
8 Sprint Communications Co., L.P.
1850 Gateway Drive, 7th Floor
9 San Mateo, CA 94404-2467

10 Timothy Berg
Fennemore, Craig, P.C.
11 3003 N. Central Avenue
Suite 2600
12 Phoenix, Arizona 85012-3913

13 Charles Steese
Qwest
14 1801 California Street, Ste. 5100
Denver, Colorado 80202

15 Joan S. Burke
16 Osborn & Maledon
2929 N. Central Avenue
17 21st Floor
Phoenix, Arizona 85067-6379

18 Richard S. Wolters
19 AT&T & TCG
1875 Lawrence Street
20 Suite 1575
Denver, Colorado 80202

21 Michael M. Grant
22 Todd C. Wiley
Gallagher & Kennedy
23 2575 E. Camelback Road
Phoenix, AZ 85016-4240

24

25

26

- 1 Raymond S. Heyman
Michael Patten
- 2 Roshka Heyman & DeWulf
Two Arizona Center
- 3 400 Fifth Street
Suite 1000
- 4 Phoenix, Arizona 85004
- 5 Diane Bacon, Legislative Director
Communications Workers of America
- 6 5818 North 7th Street
Suite 206
- 7 Phoenix, Arizona 85014-5811
- 8 Bradley Carroll, Esq.
Cox Arizona Telcom, L.L.C.
- 9 1550 West Deer Valley Road
Phoenix, Arizona 85027
- 10 Joyce Hundley
- 11 United States Department of Justice Antitrust Division
1401 H Street, N.W.
- 12 Suite 8000
Washington, D.C. 20530
- 13 Daniel Waggoner
- 14 Davis Wright Tremaine
2600 Century Square
- 15 15011 Fourth Avenue
Seattle, Washington 98101-1688
- 16 Elaine Miller
- 17 NextLink Communications, Inc.
500 108th Avenue NE, Suite 2200
- 18 Bellevue, Washington 98004
- 19 Mark N. Rogers
Excell Agent Services, LLC
- 20 2175 W. 14th Street
Tempe, Arizona 85281
- 21 Traci Grundon
- 22 Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
- 23 Portland, Oregon 97201
- 24 Mark P. Trinchero
Davis Wright Tremaine LLP
- 25 1300 S.W. Fifth Avenue, Suite 2300
Portland, Oregon 97201
- 26

LEWIS
AND
ROCA
LLP
LAWYERS

1 Gena Doyscher
Global Crossing Local Services, Inc.
2 1221 Nicollet Mall
Minneapolis, Minnesota 55403-2420

3 Penny Bewick
4 New Edge Networks, Inc.
P.O. Box 5159
5 Vancouver, WA 98668

6 Jon Loehman
Managing Director-Regulatory
7 SBC Telecom, Inc.
5800 Northwest Parkway
8 Suite 135, Room I.S. 40
San Antonio, TX 78249

9 M. Andrew Andrade
10 5261 S. Quebec Street
Suite 150
11 Greenwood Village, CO 80111

12 Douglas Hsiao
Rhythms Links Inc.
13 9100 E. Mineral Circle
Englewood, CO 80112

14 Karen Clauson
15 Eschelon Telecom, Inc.
730 2nd Avenue South
16 Suite 1200
Minneapolis MN 55402

17 Brian Thomas
18 Vice President Regulatory – West
Time Warner Telecom, Inc.
19 520 S.W. 6th Avenue
Suite 300
20 Portland, Oregon 97204

21 Andrea P. Harris
Senior Manager, Regulatory
22 Allegiance Telecom, Inc. of Arizona
2101 Webster, Suite 1580
23 Oakland, CA 94612

24
25 *Betty J. Griffin*
26